

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

NYEISHA S. GHEE,

Plaintiff,

v.

Civil Action No.: 3:25-cv-17-RCY

PINETREE APARTMENTS, LLC,

Defendant.

JOINT MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER

COMES NOW Plaintiff Nyeisha S. Ghee (“Plaintiff”), by counsel, and Defendant Pinetree Apartments, LLC (“Defendant”), by counsel, and jointly move this Court for entry of a Protective Order Governing Confidential Materials, attached to this Motion as “Exhibit 1,” stating the following in support:

1. The parties may be required to produce or disclose confidential documents or things in the course of discovery in this case.
2. Entry of the proposed attached Order Governing Confidential Materials will facilitate the orderly and cost-effective discovery of relevant information.
3. The parties and have met and conferred, and are mutually agreeable to all terms of the attached Order.

WHEREFORE, for the foregoing reasons, the parties jointly move this Court for entry of a Protective Order Governing Confidential Materials, attached to this Motion as “Exhibit 1.”

This 16th day of September, 2025.

PINETREE APARTMENTS, LLC

By: /s/ Kevin M. Kennedy
Joseph P. Moriarty (VSB No. 68465)
Kevin M. Kennedy (VSB No. 75071)
Bryn L. Clegg (VSB No. 96923)
WILLCOX & SAVAGE, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510-2243
Telephone: (757) 628-5500
Facsimile: (757) 628-5566
jmoriarty@wilsav.com
kkennedy@wilsav.com
bclegg@wilsav.com
*Counsel for Defendant Pinetree
Apartments, LLC*

NYEISHA GHEE

By: /s/ Charles H. Cuthbert, Jr.
Charles H Cuthbert, Jr., Esquire
Richard M. Cuthbert, Esquire
Cuthbert Law Offices, P.C.
220 North Sycamore Street
Petersburg, VA 23803-3228
Telephone: 804-733-3100
Facsimile: 804-732-4658
ccuthbert@cuthbertlaw.com
rcuthbert@cuthbertlaw.com
Counsel for Plaintiff

Mark J. Krudys, Esquire
Daniel Guinnane Zemel, Esquire
The Krudys Law Firm, PLC
919 East Main Street, Suite 2020
Richmond, VA 23219
Telephone: (804) 774-7950
Facsimile: (804) 381-4458
mkrudys@krudys.com
dzemel@krudys.com
Counsel for Plaintiff

CERTIFICATION

I hereby certify that on this 16th day of September, 2025, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Kevin M. Kennedy

Joseph P. Moriarty (VSB No. 68465)

Kevin M. Kennedy (VSB No. 75701)

Bryn L. Clegg (VSB No. 96923)

WILLCOX SAVAGE, P.C.

440 Monticello Avenue, Suite 2200

Norfolk, Virginia 23510-2243

Telephone: (757) 628-5500

Facsimile: (757) 628-5566

jmoriarty@wilsav.com

kkennedy@wilsav.com

bclegg@wilsav.com

Counsel for Defendant

Pinetree Apartments, LLC